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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

NOAH ROSKIN-FRAZEE,

Defendant.

CASE NO. 23-CR-00471-WHO(LC)

**STIPULATION AND [PROPOSED] ORDER TO
MODIFY CONDITIONS OF PRE-TRIAL
RELEASE**

On December 11, 2024, Defendant Noah Roskin-Frazee was arrested and placed on pre-trial release with a number of conditions, including that he surrender his passport and that his travel be restricted to the Northern District of California, where his permanent residence with his mother is located, and the Central District of California, where he was then attending college. (Dkt. 8). On January 31, 2024, the Court modified his release conditions to allow travel to Las Vegas, Nevada, where his father resides. (Dkt. 18). On February 13, 2024, the Court further modified Mr. Roskin-Frazee's travel conditions to include the Eastern District of California as the most direct routes between his home and

1 school, either by car and air, required that he travel through or over that district. (Dkt. 24). To date,
2 Pretrial Services has not alleged that Mr. Roskin-Frazee has violated any of the terms or conditions of
3 pre-trial release.

4 Mr. Roskin-Frazee now seeks to permission for two separate international trips with his family,
5 both which were planned before his arrest in this matter as celebrations of his graduation from college
6 last month. The first trip is between July 19 – July 29, 2024, and includes travel to Scotland (via
7 London) and Barcelona. The second is a trip to Canada, specifically Toronto and Montreal, between
8 August 5- August 13, 2024. Mr. Roskin-Frazee will provide his complete air travel and trip itinerary to
9 the government and Pre-trial Services in advance.

10 As the two trips are proximate in time, the parties further agree that Mr. Roskin-Frazee should be
11 allowed to retain possession of his passport until he returns from Canada on August 13, 2024. Mr.
12 Roskin-Frazee understands, however, that Pre-trial Services will have the discretion to disallow either
13 trip should he fail to comply with any conditions of his travel or violate any other conditions of his pre-
14 trial release between the time of the Court's order and the proposed travel. Neither Mr. Roskin-Frazee's
15 pre-trial services officer nor United States Attorney Nikhil Bhagat object to Mr. Roskin-Frazee's travel
16 requests, although AUSA Bhagat's approval for the second trip is conditioned upon Mr. Roskin-Frazee
17 successfully completing the first.

18 AUSA Bhagat has reviewed this Stipulation and [Proposed] Order and authorizes undersigned
19 counsel to file it on the parties' behalf.

20
21 **IT IS SO STIPULATED.**

22
23 DATED: June 17, 2024

Respectfully submitted,

24 **CONRAD | METLITZKY | KANE LLP**

25 */s/ Miranda Kane*

26 MIRANDA KANE

27 Attorney for Noah Roskin-Frazee

1 DATED: June 17, 2024

ISMAIL J. RAMSEY
United States Attorney

3 /s/ Nikhil Bhagat

4 NIKHIL BHAGAT
5 Assistant United States Attorney

[PROPOSED] ORDER

GOOD CAUSE BEING SHOWN and pursuant to the parties' stipulation, Noah Roskin-Frazee's condition of pre-trial release shall be modified to allow international travel to London, Scotland and Barcelona between July 19 – July 29, 2024, and to Canada between August 5 – August 13, 2024. Mr. Roskin-Frazee must provide Pretrial Services with his travel itinerary, including flights and accommodations, in advance of both trips. He must also provide Pretrial Services with updates if his original itinerary changes. Pretrial Services is ordered to release Mr. Roskin-Frazee's passport to him, or counsel, no later than July 17, 2024 and no earlier than July 14, 2024. Mr. Roskin-Frazee must return his passport to Pretrial Services no later than August 14, 2024. Pretrial Services retains the discretion to disallow either trip if Mr. Roskin-Frazee violates his release conditions between the date of this order and the anticipated travel dates, or if he fails to comply with the requirements of this order during the first authorized trip. All other conditions of release shall remain in effect.

IT IS SO ORDERED.

Dated: _____

THE HONORABLE JUDGE LISA J. CISNEROS
United States Magistrate Judge